

ORIGINAL

IN THE UNITED STATES DISTRICT COURT
FOR THE NORTHERN DISTRICT OF TEXAS
DALLAS DIVISION

CLERK US DISTRICT COURT
NORTHERN DIST. OF TX
FILED

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UNITED STATES OF AMERICA

No.

v.

LINZI LADAWN SHIFFLETT

3-16CR-0497B

INDICTMENT

The Grand Jury Charges:

Count One

Production of Child Pornography
(Violation of 18 U.S.C. § 2251(a) and (e))

On or about June 24, 2016, in the Dallas Division of the Northern District of Texas, **Linzi Ladawn Shifflett**, the defendant, did knowingly employ, use, persuade, induce, entice, and coerce a minor, to engage in sexually explicit conduct for the purpose of producing a visual depiction of such conduct, which visual depiction was transported and transmitted using any means and facility of interstate and foreign commerce and, in and affecting interstate and foreign commerce, and which visual depiction was produced using materials that had been mailed, shipped, and transported in and affecting interstate and foreign commerce by any means, including by computer, by using an HTC cellular telephone to create a visual depiction of the minor child, engaged in sexually explicit conduct, as defined in 18 U.S.C. § 2256, including the following described image file:

Image File	Description
IMAG0140.jpg	Image file depicting a prepubescent female child, approximately four years old, lying on a quilt. The child's genitals are exposed and the image is focused

	on her genitals.
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In violation of 18 U.S.C. § 2251(a) and (e).

Count Two
 Production of Child Pornography
 (Violation of 18 U.S.C. § 2251(a) and (e))

On or about September 28, 2016, in the Dallas Division of the Northern District of Texas, **Linzi Ladawn Shifflett**, the defendant, did knowingly employ, use, persuade, induce, entice, and coerce a minor, to engage in sexually explicit conduct for the purpose of producing a visual depiction of such conduct, which visual depiction was transported and transmitted using any means and facility of interstate and foreign commerce and, in and affecting interstate and foreign commerce, and which visual depiction was produced using materials that had been mailed, shipped, and transported in and affecting interstate and foreign commerce by any means, including by computer, by using an HTC cellular telephone to create a visual depiction of the minor child, engaged in sexually explicit conduct, as defined in 18 U.S.C. § 2256, including the following described image files:

Image File	Description
0082d9bf-9ff6-44e8-a201-b027b935731f.jpg	Image file depicting a prepubescent female child, approximately four years old, with her legs spread to expose her genitals. An adult's finger is touching the child's pelvic region to spread the child's genitals open.
7ee0b323-62eb-4ce3-bb88-8e8483a3bf40.jpg	Image file depicting a prepubescent female child, approximately four years old, with her legs spread to expose her genitals. An adult's finger is touching the child's pelvic region to spread the child's genitals open.

In violation of 18 U.S.C. § 2251(a) and (e).

Count Three
Transporting and Shipping Child Pornography
(Violation of 18 U.S.C. § 2252A(a)(1))

On or about February 25, 2016, in the Dallas Division of the Northern District of Texas, and elsewhere, **Linzi Ladawn Shifflett**, the defendant, knowingly transported and shipped child pornography using a means and facility of interstate and foreign commerce, and in and affecting interstate and foreign commerce by any means, including by computer. Specifically, she used an HTC cellular telephone and the Internet to send and transmit a file of a minor engaged in sexually explicit conduct and the lewd and lascivious exhibition of the genitals of a minor, as defined in 18 U.S.C. § 2256, including the following described video file:

Image File	Description
VIDEO0004.3pg	Video file showing the defendant holding a nude prepubescent female child. The cellular telephone's camera is focused on the child's genitals and buttocks, which are displayed in a lewd and lascivious manner.

In violation of 18 U.S.C. § 2252A(a)(1).

Notice of Forfeiture
(18 U.S.C. § 2253(a)(1) and (3))

Upon conviction of any of the offenses alleged in Counts One through Three, and pursuant to 18 U.S.C. § 2253(a), **Linzi Ladawn Shifflett**, the defendant, shall forfeit any visual depiction described in 18 U.S.C. § 2252 and § 2252A and (a) any book, magazine, periodical, film, videotape, or other matter which contains any such visual depiction, which was produced, transported, mailed, shipped, or received in the respective offense; (b) any property, real or personal, constituting or traceable to gross profits or other proceeds obtained from the respective offense; and (c) any property, real or personal, used or intended to be used to commit or to promote the commission of the respective offense and any property traceable to such property.

The above-referenced property subject to forfeiture from the defendant includes, but is not limited to the following items: HTC white cellular telephone, model OPM9120, containing a 64GB Patriot flash memory card belonging to **Linzi Ladawn Shifflett**.

A TRUE BILL

FOREPERSON

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THE UNITED STATES OF AMERICA

v.

LINZI LADWAN SHIFFLETT

INDICTMENT

18 USC § 2251(a) and (e)
Production of Child Pornography

18 USC § 2252A (a)(1)
Transporting and Shipping Child Pornography

18 USC § 2251(a)(1) and (3)
Forfeiture Notice

3 Counts

A true bill rendered

DALLAS

FOREPERSON

Filed in open court this 16th day of November, 2016.

Warrant to be Issued - In State Custody: Linzi Ladawn Shifflett

UNITED STATES MAGISTRATE JUDGE
No Criminal Matter Pending